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**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:

MONEYLINE ANALYTICS, LLC,  
  
Debtors.

Case No. 21-12443-nmc  
Chapter 7

EX PARTE MOTION TO WITHDRAW AS  
COUNSEL FOR JAISEN FREEMAN AND  
FREEMAN MASTER HOLDINGS, LLC

Judge: Hon. Natalie M. Cox

Mary Langsner, Ph.D. ("Attorney Langsner") of the law firm Holley Driggs (the "Firm") respectfully requests entry of an order permitting withdrawal as counsel for Jaisen Freeman and for Freeman Master Holdings, LLC (collectively, the "Freemans") in the above-captioned matter.

This Motion based upon the Declaration of Mary Langsner, Ph.D. submitted concurrently herewith pursuant to Local Rules of Bankruptcy Practice of the United States District Court for the District of Nevada ("LR") 9014(c) (the "Decl."); the Memorandum of Points and Authorities herein; and the pleadings and papers of record on file in this Case, judicial notice of which is respectfully requested pursuant to FED. R. EVID. 201(b) and (c) and 1101(a) and (b).

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. STATEMENT OF FACTS**

1. Attorney Langsner has appeared as counsel of record for Freemans in this case since approximately December 2021. *See generally* ECF No. 56 ("Appearance").<sup>1</sup>

<sup>1</sup> All references to "ECF No." are to the numbers assigned to the documents filed in the bankruptcy case identified in the caption above ("Case") as they appear on the docket ("Docket") maintained by the Clerk of the Court of the United

2. The names of Jaisen Freeman and Freeman Master Holdings, LLC were included in the Notice of Appearance on file in this Case at ECF No. 56.

3. The Freemans were in contact with the Firm in December 2021, and based upon that contact the Firm understood the Freemans were hiring the Firm to represent their interests in this Case.

4. However, since that time, the Freemans have not executed the Firm's retainer agreement and have not responded to the Firm's multiple attempts to contact the Freemans.

5. Specifically, on multiple occasions December 2021 through January 2022 the Firm contacted Mr. Freeman requesting execution of the retainer agreement. *See Decl.*

6. No response was received from the Freemans in connection with these communications. *See Decl.*

7. As such, the Freemans have not executed the Firm's retainer agreement, which is necessary to continue as counsel for the Freemans in this matter.

8. The Firm's withdrawal will not result in delay of discovery, hearings, or any trials in this Case.

9. In addition, on December 27, 2021, and January 13, 2022, the Firm advised the Freemans of the extended February 10, 2022, deadline for the Freemans to file a complaint seeking a determination of nondischargeability and/or a denial of discharge complaint against Matthew and Sonya Turnipseede in connection with the *In re Turnipseede* bankruptcy case, Bankr. D. Nev. Case No. 21-14688-ABL. *See Decl.*

## II. ANALYSIS

### A. Withdrawal of Counsel is Appropriate

LR 2014(c) incorporates by reference Local Rule of Practice for the United States District Court for the District of Nevada ("Dist. LR") IA 11-6(b), which provides that an attorney seeking to withdraw after appearing in a case must file a motion and serve it on the affected client and opposing counsel. Further, Dist. LR IA 11-6(e) provides in pertinent part:

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States Bankruptcy Court for the District of Nevada.

1 Except for good cause shown, no withdrawal or substitution will be  
2 approved if it will result in delay of discovery, the trial, or any  
3 hearing in the case.

4 Here, the Freemans have been given reasonable notice of Firm's withdrawal as counsel of  
5 record in this case, and opposing counsel, if any, will receive notice upon service of this Motion.  
6 The Firm's withdrawal will not result in undue prejudice, nor will it result in a delay of any  
7 discovery, trial, or hearing, because there are currently no discovery, hearings, or trials impactful  
8 to the Freemans' interests. Therefore, good cause for withdrawal exists.

9 Dated this 21st day of January, 2022.

**HOLLEY DRIGGS**

/s/ Mary Langsner

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Robert Schuerger; Thomas Weihe, by and  
through his representative Gwen Weihe; Jeffrey  
Wright*

HOLLEY DRIGGS

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Holley Driggs, and that on the 21st day of January, 2022, I caused to be served a true and correct copy of EX PARTE MOTION TO WITHDRAW AS COUNSEL FOR JAISEN FREEMAN AND FREEMAN MASTER HOLDINGS, LLC in the following manner:

☒ (ELECTRONIC SERVICE) Under Local Rule 5005 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

☐ (FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

/s/ Norma S. Moseley  
An employee of Holley Driggs